

EXHIBIT C

Defendants' Initial Proposed Search Terms

Terms are not intended to be case sensitive

Request No. 5: Documents and Communications concerning the drafting and negotiating of the Loan Documents.

- We do not believe search terms will be useful for locating and reviewing drafts of the agreement unless Plaintiffs are willing to run terms like “Union Station.” We are open to any suggestions you have on this.

Request No. 10: Documents concerning and Communications with Amtrak concerning Union Station.

- All communications between email addresses containing (rexmark.com OR ktb.com) AND amtrak.com

Request No. 12: Documents and Communications reflecting efforts to communicate with or meet with existing or prospective tenants at Union Station.

- (“Union Station” OR USDC OR WUS OR “50 Massachusetts Ave*” OR “50 Mass”) AND (tenan* OR leas* OR subleas* OR renew* OR Cushman OR nondisclosure OR non-disclosure OR Ashkenazy OR AAC OR broker*)
- Tenant Terms (below)

Request No. 13: Documents and Communications with real estate brokers regarding Union Station.

- (“Union Station” OR USDC OR WUS OR “50 Massachusetts Ave*” OR “50 Mass”) AND (tenan* OR leas* OR subleas* OR renew* OR Cushman OR nondisclosure OR non-disclosure OR Ashkenazy OR AAC OR broker*)
- Tenant Terms (below)

Request No. 18: Documents and Communications concerning Your right to negotiate settlement agreements in the Condemnation Action.

- condemn* AND (settle* OR resolv* OR “attorney-in-fact” OR “attorney in fact” OR Amtrak OR sale OR purchas* OR Washington OR “Union Station”)
 - o Can categorically exclude all communications FROM or TO an email address containing morrisoncohen.com

Request No. 19: Documents and Communications relating to the Equity Investment.

- “sovereign wealth fund”
- PIF
- “public investment fund”
- “Aude”
- CFIUS
- “Biren Amin”
- (approv* /100 (invest* OR structu* OR restruc*)) AND (“Union Station” OR USDC OR WUS OR “50 Massachusetts Ave*” OR “50 Mass”)

Request No. 20: Communications with Blackrock relating to Union Station.

- Communications between an email address containing (rexmark.com OR i-ktb.com) and any blackrock.com email addresses which hit on: “Union Station” OR USDC OR WUS OR 2018-USDC OR Ashkenazy OR AAC OR Ben OR Benny

Request No. 21: Communications with SL Green relating to Union Station

- Communications between an email address containing (rexmark.com OR i-ktb.com) and any slgreen.com email addresses which hit on: “Union Station” OR USDC OR WUS OR 2018-USDC OR Ashkenazy OR AAC OR Ben OR Benny
- Also search all communications for “Green Loan Services”

Request No. 22: Communications with Wells Fargo relating to Union Station.

- Communications between an email address containing (rexmark.com OR i-ktb.com) and any wellsfargo.com email addresses which hit on: “Union Station” OR USDC OR WUS OR 2018-USDC OR Ashkenazy OR AAC OR Ben OR Benny

Tenants Terms

Alamo	Cobbler's OR Cobblers
Aloha	“Comfort One Shoes”
“Americas Spirit”	“Crepe Lena”
“Andrew's Ties”	Dunkin
“Ann Taylor”	“East Street Cafe”
“Au Bon Pain”	Einstein
“Auntie Anne's” OR “Auntie Annes”	FlixBus
Aurea	H&M
Avis	“Haagen Dazs”
“Bank of America”	“Halal Guys”
Bejewelled	“Hat House”
“Best Nails”	Hertz
“Big Bus Tours”	Heydaris
“Blue Bottle Coffee”	“Hotel Chocolat”
Bluemercury	“Hudson News”
“Body Shop”	“Jamba Juice”
Bojangles	Jana
“Cajun & Grill” OR “Cajun Grill”	“Jersey Mike's” OR “Jersey Mikes”
“Creative Food”	“Johnny Rockets”
Cava	“Jos A Bank” OR “Joseph A Bank” OR (Jos* /5 Bank*)
Charleys	“Juice Press”
Chick-fil-a OR Chickfila OR “Chick fil a”	Kiehl's OR Kiehls
Chipotle	L'Occitane OR Loccitane OR occitane
Chipotle	Laduree
Chop't OR Chopt	“Le Pain Quotidien”
Claire's OR Claires	

“Legal Sea Bar”
“Lost City Art”
“Mac Cosmetics”
“Magnolia Bakery”
McDonald’s OR McDonalds
“MDB Communications”
LaFleur
“Mustard Seed Massage”
“National Car”
Neuhaus
“New Tradition”
“New York New York”
“Old Town Trolley” OR (Trolley /5
Washington)
“Panda Express”
Papyrus
“Phone Repair Lab”
Potbelly
Pret
Roti
“Sage Hospitality”
Sakura
Sbarro’s OR Sbarro OR Sbarros
“Shake Shack”
“Special Events” /5 “Union Station”
Starbucks
Subway
“Sunstone Candles”
“Taco Bell”
Pennyman
“Thunder Grill”
Tolani
“Under 30 Day Deals”
“Union General Store”
“Union Station Redevelopment” OR USRC
“Union Station Shoe Shine”
“Union Wine”
Uniqlo
“Unique Eyebrows”
“United States Postal Service” OR “Post
Office” OR USPS
“Uno Chicago Grill”
Verizon
“Victoria’s Secret” OR “Victorias Secret”
Walgreens
“Warby Parker”
Wendy’s OR Wendys
“Wow Bao”
Yeung’s OR Yeungs
Zoomsystems